

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GEORGIA BICKERSTAFF

Plaintiff

vs.

EDWARD LOHN, ET AL.

Defendant

) CASE NO. 1:03CV240
)
)

) JUDGE PAUL R. MATIA
)

) PLAINTIFF'S RESPONSE TO
) ADMISSIONS REQUEST FROM
) DEFENDANT CITY OF CLEVELAND
)
)

Now comes Plaintiff, by and through undersigned counsel, and hereby responds to
the all of the Defendants Request for Admissions as follows:

Request # 1. Admit

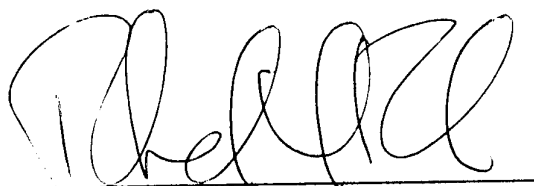
Request # 2. Admit

Request # 3. Admit

Request # 4. Admit

Request # 5. Admit.

Respectfully submitted,

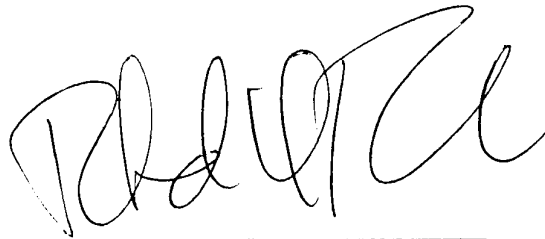


Richard H. Drucker, #0002466
Attorney for Plaintiff
13224 Shaker Square, Suite 205
Cleveland, OH 44120
(216) 791-2900

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was sent by regular U.S. Mail, postage prepaid, on this 8th day of September 2003 to the following:

Natalie L. Peterson
Thomas J. Kaiser
Chief Assistant Director of Law
City of Cleveland, Department of Law
601 Lakeside Avenue, Suite 106
Cleveland, Ohio 44114
Attorney for All Defendants

A handwritten signature in black ink, appearing to read 'Richard H. Drucker', written over a horizontal line.

Richard H. Drucker

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GEORGIA BICKERSTAFF,)	CASE NO. 1:03CV240
)	
Plaintiff,)	JUDGE PAUL MATIA
)	
v.)	
)	
EDWARD LOHN, et al.,)	
)	
Defendants.)	<u>DEFENDANTS' FIRST SET OF REQUESTS</u>
)	<u>FOR ADMISSION</u>

Defendants Edward Lohn, the City of Cleveland, Officer Raymond Chipgus, and Officer Antonia Montijo submit to Plaintiff Georgia Bickerstaff the following Requests for Admission to answer separately and fully in writing under oath within 30 days after service thereof and in the manner provided under Federal Rule of Civil Procedure 36. All document numbers refer to the documents produced by Defendants as part of their Initial Disclosures.

REQUESTS FOR ADMISSION

1. Admit that the document produced by Defendants and numbered 000007-000016 is a true and correct copy of the Coroner's Office's Autopsy Report concerning the decedent, Craig L. Bickerstaff.
 2. Admit that according to document number 000009, the decedent weighed 409 pounds and was 72 inches tall.
 3. Admit that the document numbered 000057-000058 is a true and accurate copy of the Coroner's Office's Toxicology Laboratory Report that was based upon samples of the decedent's bodily fluids.
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4. Admit that the Toxicology Laboratory Report (document numbers 000057-000058) indicates that the decedent had a .29 mg/L concentration of phencyclidine in his blood at the time of the autopsy.
5. Admit that the Craig Bickerstaff referred to in document numbers 000427-000557 is the decedent.

Respectfully submitted,

SUBODH CHANDRA (0069233)
Director of Law

By:

THOMAS J. KAISER (0014339)
Chief Trial Counsel
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Counsel for Defendants Edward Lohn,
City of Cleveland, Raymond Chipgus,
and Antonia Montijo

CERTIFICATE OF SERVICE

I certify that I sent a true and accurate copy of the foregoing Defendants' First Set of Requests for Admission via U.S. mail postage pre-paid on August ____, 2003 to:

Richard H. Drucker, Esq.
13224 Shaker Square, Suite 205
Cleveland, Ohio 44113-0000

One of the Attorneys for Defendants